

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Revision of Filing)
Requirements)

CC Docket No. 96-23

APR 8 1996

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

COMMENTS DOCKET FILE COPY ORIGINAL

Sprint Corporation ("Sprint") hereby files Comments to the Notice of Proposed Rulemaking in the above-referenced docket.¹ In this NPRM, the Commission is proposing to reduce or eliminate certain public reporting requirements for telecommunications providers.

Sprint supports the Commission's efforts to reduce and eliminate the number of reports to be filed. For those reports which affect Sprint, we provide the following comments.

I. BILLING AND COLLECTION CONTRACTS.

Sprint supports the Commission's proposed elimination of the reporting requirement for the reasons cited by the Commission and agrees that a list of all billing and collection agreements is unnecessary.²

II. CIRCUIT REPORT

The Commission is proposing to eliminate Section 63.07(b) which requires non-dominant carriers to report the construction and acquisition of circuits on a

¹In the Matter of Revision of Filing Requirements, Notice of Proposed Rulemaking ("NPRM"), CC Docket No. 96-23, released February 27, 1996.

²NPRM, ¶10.

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semi-annual basis. This rule was adopted in the Competitive Carrier Proceeding³ to implement Section 214 regulation for non-dominant carriers. In that order, the Commission stated that “Congress enacted Section 214 and subsequent amendments to serve primarily as a protection against excessive expenditures on plant by rate-base regulated common carriers and against service discontinuance by carriers in areas where customers had no reasonable alternative service available.”⁴ The Commission reasoned in 1980 that its oversight of non-dominant carriers’ investments could be reduced because such carriers are unlikely to survive if they make excessive investments and competitors offer alternatives to customers.

Today, with the growth in the competitive interexchange market, there is little need for oversight over the non-dominant carrier’s facilities. As the Commission notes, it can obtain information on an individual case basis as necessary. Thus, Sprint strongly supports the Commission’s proposal to eliminate the reporting requirements under Section 63.07(b).

III. ARMIS SERVICE QUALITY REPORT 43-05

This quarterly report for price cap LECs is designed to capture trends in quality of service under the Commission’s price cap rules.⁵ Sprint praises the Commission’s prompt release of an Order establishing an annual filing requirement which is a significant improvement over the quarterly reporting requirements.⁶

³85 FCC 2d 1 (1980).

⁴*Id.* at 39.

⁵NPRM, ¶15.

⁶In the Matter of Revision of Filing Requirements and Implementation of Section 402(b)(2)(B) of the Telecommunications Act of 1996: Annual ARMIS Reports, Order, CC Docket No. 96-23, released March 20, 1996.

IV. NEW SERVICE TRACKING REPORT

Sprint supports the reduction in frequency of this report from quarterly to annual, however, Sprint believes the report should be eliminated entirely.⁷ Sprint finds that customer input for demand projections are often inadequate and skew results that are submitted on this report. The report as currently drafted is not an adequate mechanism for collecting this information. Therefore, the report should be eliminated.

V. PAYPHONE COMPENSATION

The Commission is proposing to reduce the reporting by AT&T and Sprint of compensation paid to private payphone operators for interstate traffic originating from those payphones from a quarterly to a semi-annual filing. While Sprint supports this initiative, Sprint believes that the reporting requirement should be eliminated.

As the Commission noted in its grant of Sprint's waiver application to implement per-call compensation,⁸ Sprint and AT&T have implemented its preferred compensation mechanism, and Sprint's waiver request was unopposed. Nevertheless, the Commission imposed the quarterly reporting requirement as a condition to the grant of the waiver.⁹ If the Commission needs the information contained in the report, such as the total amount paid, the number of calls received or the number of payphone operators receiving payment, it could request such information from Sprint and AT&T on an ad hoc basis, under Section 218 of the

⁷NPRM, ¶18.

⁸10 FCC Rcd 5490 (1995).

Act. If disputes arise with the private payphone operators concerning payment, the Commission's complaint processes under Section 208 are available. As far as Sprint is aware, the Commission has not received any complaints concerning Sprint's payment of a dial-around compensation on a per call basis.

Thus, Sprint urges the Commission to eliminate the payphone compensation reports.

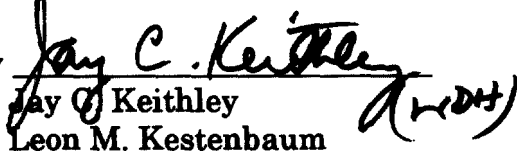
VI. CONCLUSION.

Sprint supports the Commission's efforts in reducing the number of reports to be filed or eliminating the reports entirely.

Respectfully submitted,

SPRINT CORPORATION

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April 8, 1996

⁹*Id.* at 5491.

CERTIFICATE OF SERVICE

I, **Melinda L. Mills**, hereby certify that I have on this 8th day of April, 1996, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments" of Sprint Corporation in the Matter of Revision of Filing Requirements, CC Docket No. 96-23, filed this date with the Acting Secretary, Federal Communications Commission, to the persons on the attached service list.


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